

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**19-CR-1631 KWR**

**JOHNATHAN CRAFT, a.k.a.  
“Jonathan Craft,” a.k.a., “YN,”  
a.k.a. “Wayan,”**

**Defendant.**

**UNOPPOSED MOTION TO EXTEND DEADLINE TO RESPOND**

COMES NOW, the defendant Johnathan Craft, by and through his counsel of record, Marshall J. Ray, and hereby moves this Court to enter an Order extending the deadline to file his response to the Government’s Notice of Intent and Motion To Introduce Evidence Of Coconspirator Statements Pursuant To FRE 801(d)(2)(E) [Doc. 134]. As grounds therefore Defendant states as follows:

1. On August 28, 2020 the Government filed a Notice of Intent And Motion To Introduce Evidence Of Coconspirator Statements Pursuant To FRE 801(d)(2)(E). [Doc. 134]
2. Pursuant to an Unopposed Motion To Extend Deadlines For Filing Motions, which was filed by the Government and not opposed by the defense, the deadline to respond to motions was extended to September 11, 2020. [Doc. 133]
3. Defense counsel has been diligently working to respond to the Government’s motion but needs additional time to file a response and respectfully requests an extension of three days to September 14<sup>th</sup>, 2020 to file his response.

4. This short extension will not cause any undue delay or prejudice to any of the parties in this matter.
5. Assistant United States Attorney Letitia Simms does not oppose the relief sought in this motion.

WHEREFORE, for the foregoing reasons, Mr. Craft respectfully moves this Court for an extension of time to respond to the Government's Notice of Intent And Motion To Introduce Evidence Of Coconspirator Statements Pursuant To FRE 801(d)(2)(E) up to and including September 14, 2020.

Respectfully Submitted,

LAW OFFICES OF MARSHALL J. RAY, LLC

/s/ Marshall J. Ray  
Marshall J. Ray  
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*Attorney for Defendant Johnathan Craft*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of September 2020, I filed the foregoing pleading via CM-ECF, causing all registered parties to be served.

/s/ Marshall J. Ray  
Marshall J. Ray